

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

ALVIN BALDUS, CARLENE BECHEN,
ELVIRA BUMPUS, RONALD BIENDSEI,
LESLIE W. DAVIS, III, BRETT
ECKSTEIN, GEORGIA ROGERS,
RICHARD KRESBACH, ROCHELLE
MOORE, AMY RISSEEUW, JUDY
ROBSON, JEANNE DANCHEZ-BELL,
CECELIA SCHLIEPP, TRAVIS
THYSSEN and CINDY BARBERA,

Plaintiffs,

TAMMY BALDWIN, GWENDOLYNNE
MOORE, and RONALD KIND,

Intervenor-Plaintiffs,

v.

Members of the Wisconsin Government
Accountability Board, each only in his
official capacity: MICHAEL BRENNAN,
DAVID DEININGER, GERALD NICHOL,
THOMAS CANE, THOMAS BARLAND,
TIMOTHY VOCKE, and KEVIN
KENNEDY, Director and General Counsel
for the Wisconsin Government
Accountability Board,

Defendants,

F. JAMES SENSENBRENNER, JR.,
THOMAS E. PETRI, PAUL D. RYAN, JR.,
REID J. RIBBLE, and SEAN P. DUFFY,

Intervenor-Defendants

Case No. 11-C-562
JPS-DPW-RMD

VOCES DE LA FRONTERA, INC.,
RAMIRO VARA, OLGA VARA, JOSE
PEREZ, and ERICA RAMIREZ,

Case No. 11-CV-1011
JPS-DPW-RMD

Plaintiffs,

v.

Members of the Wisconsin Government
Accountability Board, each only in his
official capacity: MICHAEL BRENNAN,
DAVID DEININGER, GERALD NICHOL,
THOMAS CANE, THOMAS BARLAND,
TIMOTHY VOCKE, and KEVIN
KENNEDY, Director and General Counsel
for the Wisconsin Government
Accountability Board,

Defendants.

**Certification of Compliance with
Fed. R. Civ. P. 26(c)(1) and Civil Local Rule 37**

Defendants, Michael Brennan, David Deininger, Gerald Nichol, Thomas
Case, Thomas Barland, Timothy Vocke, and Kevin Kennedy (each in their official
capacity), by their attorneys, J.B. Van Hollen, Attorney General, and
Maria S. Lazar, Assistant Attorney General, and Reinhart Boerner Van Deuren,
s.c., by Patrick J. Hodan, Daniel Kelly, and Colleen E. Fielkow, certify that prior
to filing their motion for a protective order and pursuant to Fed. R. Civ. P. 26(c)(1)
and Civil Local Rule 37, they have in good faith conferred with plaintiffs in an
effort to resolve their dispute regarding the discoverability of errors in federal

census data discovered after enactment of 2011 Wisconsin Act 43 & 44 without court action. Counsel for Defendants Daniel Kelly, Patrick Hodan and Maria Lazar conferred with counsel for Plaintiffs, Douglas Poland via teleconference on January 16, 2012 from roughly 2:00-2:30 p.m. However, those efforts failed.

Dated this 16th day of January, 2012.

Wisconsin Department of Justice
Post Office Box 7857
Madison, Wisconsin 53707-7857
(608) 267-3519
(608) 267-2223 (fax)
lazarms@doj.state.wi.us

J.B. VAN HOLLEN
Attorney General

s/Maria S. Lazar
MARIA S. LAZAR
Assistant Attorney General
State Bar #1017150

Reinhart Boerner Van Deuren s.c.
1000 North Water Street, Suite 1700
Milwaukee, WI 53202
Telephone: 414-298-1000
Facsimile: 414-298-8097

s/Daniel Kelly
Daniel Kelly
WI State Bar ID No. 1001941
dkelly@reinhartlaw.com
Patrick J. Hodan
WI State Bar ID No. 1001233
phodan@reinhartlaw.com
Colleen E. Fielkow
WI State Bar ID No. 1038437
cfielkow@reinhartlaw.com

Attorneys for Defendants

REINHART\8234373